

BY U.S. MAIL
RETURN RECEIPT REQUESTED

June 25, 2014

Ms. Susan Mackert
Department of Environmental Quality
Northern Regional Office
13901 Crown Court
Woodbridge, VA 22193

RE: Dominion Possum Point Power Station VPDES Permit No. VA0002071
Permit Modification Request

Dear Ms. Mackert:

Virginia Electric & ~~power~~ Power Company d/b/a Dominion Virginia Power (Dominion) is submitting the enclosed application to modify the subject permit a VPDES permit modification request and supporting documentation to request the following for the following reasons:

- 1) ~~Re-establishment~~ To incorporate stormwater discharges that may result from activities within the drainage area associated with Outfall S104 as a stormwater outfall from the inactive Ash Ponds A, B and C;
- 2) ~~To recognize~~ Approval of the discharge from the Unit 6 RO trailers as a permanent discharge. ~~DEQ previously approved the temporary discharge. The station plans to use the RO trailers on a regular basis; and~~
- 3) ~~Approval of requests~~ To incorporate several additional changes to modify language and discharge description in the permit.

Comment [KR1]: Need to work on this description.

The enclosed documents include the updated application forms, flow diagram, maps, public notice authorization, and copies of the permit application fee form and check.

Should you have any questions and/or require additional information, please contact Oula Shehab-Dandan at 804-273-2697 or via email at oula.k.shehab-dandan@dom.com.

Sincerely,

Cathy C. Taylor
Director, Electric Environmental Services

| ~~Ebe~~bc:

Ed Baine
Pamela Faggert
Cathy Taylor
Jeffrey Heffelman
Jeff Marcell
Ken Roller
Keith Homza
Rick Woolard
Oula Shehab-Dandan

Please upload to Documentum with the following metadata:

Document type = Permit – Applications;
Environmental Program = Water – NDPES;
Facility Name = Possum Point
File Name = PP VA0002071 VPDES Permit Modification Request

**Electric Environmental Services
Signature Cover Sheet**

Submitted for Signature on:	<u>June 24, 2014</u>	EES Contact	<u>Oula Shehab</u>
Regulatory Submittal Deadline (see below):	<u>--</u>		
Station:	<u>Possum Point Power Station</u>	Project:	<u>VPDES Permit Modification</u>
Filing Name:	<u>PP VA0002071 VPDES Permit Modification Request</u>		
Description of Submittal			
<u>VPDES Permit Modification Request and supporting documents</u>			
Important Issues Associated with Submittal			
<u>n/a</u>			
Submittal Document(s)			
<u>Transmittal Letter, Permit modification application and supporting documentation</u>			
Internal Review Documents (NOT TO BE INCLUDED WITH SUBMITTAL)			
<u>[as listed above]</u>			
Signature Requirements			
Type	Name	Page Number(s)	
Cover Letter:	<u>Cathy Taylor</u>	<u>1 page (transmittal letter)</u>	
Application/Form:	<u>Ed Baine</u>	<u>2 pages (as marked)</u>	
[other]:			
Submittal Reviewers and Operation Sign-off			
Title	Name		
Station Director:			
Engineering Manager:			
ECC:	<u>Jeff Marcell</u>		
[other]:	<u>Ken Roller</u>		
Operations Sign-Off by:			
Mailing Instructions			
Submit Final Filing from	<input checked="" type="checkbox"/> (as indicated in letter)	Retain UPS/FedEx Tracking Number	
Distribute EBCs from		Send back to other address (see below)	
Special Mailing Instructions (see below)			
Special Mailing Instructions / General Comments			

Ash Ponds A, B and C
Outfall S104
EPA Form 2F

ATTACHMENT A

Stormwater Discharge from the Drainage Area Associated with Ash Ponds A, B and C Outfall S104

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Background

Ash ponds A, B, and C were actively utilized during the period from 1955 through the early 1960s. Subsequently, the ponds have been reclaimed by a natural vegetative cover. The drainage area containing the inactive Ash Ponds A, B and C ponds and the associated storm water outfall (previously referred to as Outfall S104) for the area were have been addressed in Possum Point's historical and current VPDES permitting documents. A summary of the permitting history associated with this area was provided to DEQ by letter dated May 2, 2014 (attached). As shown below, the coverage permit coverage of this area has evolved as the storm water requirements and Dominion's understanding has evolved.

In the application for renewal of Possum Point's discharge permit submitted March 2006. The application included a description of Outfall S104 and associated drainage area. The VPDES permit was reissued effective October 24, 2007. There was no specific reference to Outfall 104 in the permit; however, Table 3 of the Fact Sheet developed by DEQ to support the permit contained a list of stormwater outfalls and drainage area descriptions that included S104.

In 2008, Possum Point's stormwater Pollution Prevention Plan (SWPP) was updated and Outfall S104 was no longer specifically recognized in the plan. The drainage areas contributing to S104 were shown as sheet flow. This was likely done given the status of ponds A, B, and C at that time and previous determinations concerning the lack of potential for pollutants to be present in the discharge.

In 2012, the application for reissuance of Possum Point's VPDES permit was submitted on April 5. Form 2F listed 15 stormwater discharges from Possum Point. S104 was not included on the list. The application included the Stormwater Pollution Prevention Plan (SWPPP), which had been updated in 2011 and continued to show the drainage area associated with Ponds A, B, & C as sheet flow. The list of outfalls in the SWPPP was identical to the list in Form 2F and did not include S104. When the Possum Point's VPDES permit was reissued in 2013 it did not specifically reference the discharge from Outfall S104.

The ponds were originally constructed such that the natural drainage flowed from Pond A to Pond B to Pond C where the accumulated runoff was released to Quantico Creek through a discharge structure, which remains intact today. A recent site inspection conducted by Dominion staff revealed that the natural drainage within the area has been obstructed resulting in the erosion of a small portion of the berm associated with to Ash Pond A, B, C the ponds was eroded in two areas. In order for the Dominion to fix the berm return the stormwater flow to its natural path, drainage improvements work within the pond area are needed to divert the accumulated stormwater away from the areas close to the eroded areas

~~the proposed~~ This activity may allow previously covered ash to come into contact with stormwater runoff . Consequently, Dominion wishes to permit the resulting discharge from Pond C as is expected to change the status of Ponds ABC from stormwater sheet flow as previously permitted to stormwater discharge from associated with industrial activity and we are providing the required Form 2F with this application.

A sample of the water released from the discharge structure associated with Pond C was collected on April 2, 2014 and was analyzed for parameters that have been detected in discharges from Ash Ponds D and E at the Possum Point Power Station. The results of these analyses are contained in Part VII of the attached Form 2F. -

With respect to the Non-Stormwater Discharge certification submitted with this application. The area associated with Ponds A, B, and C has been inspected weekly since March, 2014 and a discharge from Outfall S104 has been consistently observed throughout this period. The origin of all observed discharges has been stormwater, which had ponded behind the discharge structure associated with Pond C. Throughout the period of observation the discharge resulted from the leaking of ponded water through cracks in stop logs associated with the discharge structure. No other sources of non-stormwater discharge are know to contribute to this outfall.

Modification Request

~~The discharge from Outfall S104 was previously permitted by DEQ. Dominion is requesting that DEQ re-establishes Outfall S104 as a stormwater outfall from the inactive Ash Ponds A, B and C. Outfall 104 description and EPA Form 2 F are included here.~~

Outfall S104 Description (I sent the description to Mike Winters and Jeff Marcell for their review)

Outfall: ~~VA#S 104 (includes S102 and S103)~~

Outfall Location: ~~Latitude 38° 32' 34", Longitude 77° 16' 45"~~

Description: ~~Outfall VA# S104 is a 30" concrete pipe which is integral to an inactive decant structure that previously served Ash Ponds A, B, and C. The drainage area associated with Outfall S104 is approximately 43.8 acres with 50% cleared, 10% highway, 25% medium woods, and 15% brush. Three drainage areas contribute runoff to this outfall:~~

- ~~1. A small drainage area (two acres) located on the northwest side of the intersection of Possum Point Road and Cockpit Point Road contributes runoff to Outfall S104 via pipe Outfall S102. This area consists of 5% cleared, 30% highway, and 65% medium woods.~~
- ~~2. Approximately 16.9 acres just northwest of area 1 above, and bounded to the southwest by Possum Point Road, contributes runoff to Outfall S104 via pipe #103. This area contains approximately 5% cleared, 5% highway, 35% brush, and 55% medium woods.~~
- ~~3. Approximately 25 acres (43.8 acres total minus 16.9 acres #103 and 2 acres # 102) located west of drainage areas 1 and 2 above across Possum Point Road. It is within this drainage area that the old Ash Ponds A, B, and C were located.~~

**Discharge from Unit 6 RO trailer
Updated Form 2C**

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Additional Modification Requests

Additional Modification Requests

1. We request that the DEQ add uncontaminated river water to the Storm Water allowable discharges in section ? of the permit; similar requests have been ~~made~~granted for other Dominion stations, ~~and DEQ granted the requests.~~
2. We request that DEQ approve the use of Unit 5 Circulating Water Make-up as back-up raw water supply for Unit 6. The updated flow diagram reflects the change, which should have and shows there will be no impact to Outfall 001/002 discharge.
3. Since Outfall 007 (Intake Screen Backwash Water) is the primary Outfall for the Units 3, 4, 5 and 6 intake screen backwash water, and Outfall 009 is an intermittent discharge and only includes discharges from Units 3&4 intake screen backwash, the station would only use Outfall 009 if the bridge and trough connecting the intakes fails. Outfall 007 and 009 would be separate until repairs are made to the bridge and trough. For this reasons, we request that the DEQ rewords the descriptions for Outfalls 007&009 in Part I A of the permit (pages 5 & 7) as follows:

Part 1A. Page 5

5. **Outfall 007 – Intake Screen Backwash Water** ~~(Units 5 and 6 formerly Units 1 and 2)~~ (Units 3, 4, 5, and 6)
 - a. There shall be no discharge of floating solids or visible foam in other than trace amounts.
 - b. During the period beginning with the permit's effective date and lasting until the expiration date, the permittee is authorized to discharge from Outfall Number 007. Such discharges shall be limited and monitored by the permittee as specified below.
 - c. ~~The permittee is authorized to discharge Intake Screen Backwash Water from Units 3 and 4 through Outfall 007 until such time that Outfall 009 is operational.~~

Part 1A. Page 7

7. **Outfall 009 – Intake Screen Backwash Water (Units 3 and 4)**
 - a. There shall be no discharge of floating solids or visible foam in other than trace amounts.
 - b. During the period beginning with the permit's effective date and lasting until the expiration date, the permittee is authorized to discharge from Outfall Number 009. Such discharges shall be limited and monitored by the permittee as specified below.
 - c. ~~Until such time that Outfall 009 is operational, the permittee is authorized to discharge Intake Screen Backwash Water from Units 3 and 4 through Outfall 007.~~

Public Notice Authorization

**Permit Application Fee Form
&
Check**